

To: Michael Ritorto[mritorto@rouxinc.com]
From: Cirian, Mike
Sent: Mon 2/27/2017 11:07:16 PM
Subject: FW: CFAC SAP Modification #9
removed.txt
SAP-Record of Modification No 9_EF.docx

Hello Michael,

Please take a look at Erin's (CDMs) comments in regards to Mod 9. We can discuss this Wednesday Morning.

Thanks

Mike

Mike Cirian, PE

Libby On-site Project Manager

US EPA

108 East 9th Street

Libby, MT 59923

(406) 293-6194 Office

From: Formanek, Erin
Sent: Monday, February 27, 2017 10:55 AM
To: Emilsson, Gunnar <EmilssonGR@cdmsmith.com>
Subject: RE: CFAC SAP Modification #9

Gunnar,

Typically, total cyanide is analyzed and if there are exceedances of screening values, then analysis of samples for free cyanide would be appropriate. However, I do have some criticism of the mod. It is stated that locations that have one or more exceedances of the DEQ-7 value for cyanide will have analysis of total and free cyanide in the next round of sampling. DEQ-7 is not the most conservative screening value, the EPA tapwater RSL is the lowest value. Because we have not yet been able to view the data, I am not certain if there are other locations that should be identified for free cyanide analysis when using the most conservative screening value. There is a large difference between the DEQ-7 value (200 ug/L) and the EPA tapwater RSL (0.15 ug/L). I expect there are other locations that should have this analysis performed. Why has DEQ-7 been chosen to select locations? Rationale should be provided in the mod for the selection of DEQ-7 as the screening level of choice.

Please let me know if it would be helpful to discuss this.

Thank you,

Erin

From: Emilsson, Gunnar
Sent: Monday, February 27, 2017 9:31 AM
To: Formanek, Erin <formanekek@cdmsmith.com>
Subject: FW: CFAC SAP Modification #9

Hi Erin:

Any thoughts on free vs. total cyanide analysis. The question in the attached request seems to be one of risk.

Thanks,

Gunnar

From: Michael Ritorto [<mailto:mritorto@rouxinc.com>]
Sent: Tuesday, February 21, 2017 3:50 PM
To: Cirian, Mike <Cirian.Mike@epa.gov>
Cc: Hoogerheide, Roger <Hoogerheide.Roger@epa.gov>; John.Stroiazzo@glencore-ca.com;
Steve Wright - CFAC <swright@cfaluminum.com>; lidewitt@mt.gov; cowen@mt.gov;
repinedl@cdmsmith.com; Andrew Baris <abaris@rouxinc.com>; Laura Jensen
<ljensen@rouxinc.com>
Subject: CFAC SAP Modification #9

Hello Mike,

Please see the attached SAP Modification #9 which describes additional sampling that CFAC/Roux is proposing to complete during the next groundwater and surface water sampling event. Please let me know if you have any questions.

Michael Ritorto

Senior Hydrogeologist | ROUX ASSOCIATES, INC.

209 Shafter Street | Islandia, New York 11749

Direct: (631)630-2370 | Mobile: (631)445-4576

Email: mritorto@rouxinc.com | Website: www.rouxinc.com

We solve our clients' most challenging environmental problems.

Follow us on:     Check out our blog: 